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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.)
TYSON FOODS, INC., et al,)
Defendants.)

4:05-CV-00329-TCK-SAJ

- - - - -

THE VIDEOTAPED 30(b)(6)
DEPOSITION OF PATRICK PILKINGTON, produced as a
witness on behalf of the Plaintiff in the above
styled and numbered cause, taken on the 20th day of
August, 2007, in the City of Fayetteville, County of
Washington, State of Arkansas, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

A P P E A R A N C E S

FOR THE PLAINTIFFS: Mr. Richard Garren
Mr. David Riggs
Attorneys at Law
502 West 6th Street
Tulsa, OK 74119
-and-
Mr. Louis W. Bullock
Attorney at Law
222 South Kenosha
Tulsa, OK 74120

FOR TYSON FOODS: Mr. Robert George
Mr. Michael Bond
Attorneys at Law
The Three Sisters Bldg.
214 West Dickson Street
Fayetteville, AR 72701
-and-
Mr. Ed Fitzpatrick

FOR CARGILL: Ms. Theresa Noble Hill
Attorney at Law
100 West 5th Street
Suite 400
Tulsa, OK 74103
-and-
Ms. Dara Mann
Attorney at Law
90 South 7th Street
Suite 2200
Minneapolis, MN 55402

FOR SIMMONS FOODS: Mr. John Elrod
Attorney at Law
211 East Dickson Street
Fayetteville, AR 72701

FOR PETERSON FARMS: Mr. Scott McDaniel
Attorney at Law
320 South Boston
Suite 700
Tulsa, OK 74103

1 FOR GEORGE'S:

Mr. Paul Thompson
Attorney at Law
221 North College
Fayetteville, AR 72701

4 FOR CAL-MAINE:

Mr. Robert Sanders
Attorney at Law
2000 AmSouth Plaza
P. O. Box 23059
Jackson, MS 39225

7 FOR WILLOW BROOK:

Ms. Jennifer Griffin
Attorney at Law
314 High Street
Jefferson City, MO 65109
(Via phone)

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I N D E X

W I T N E S S

P A G E

PATRICK PILKINGTON

Direct Examination by Mr. Garren 6

Signature Page 202

Reporter's Certificate 203

1 (Whereupon, the deposition began at
2 1:02 p.m.)

3 VIDEOGRAPHER: We are now on the Record for
4 the deposition of Mr. Patrick Pilkington. Today is
5 August 20th, 2007. The time is 1:04 p.m. Would 01:02PM
6 counsel please identify themselves for the Record?

7 MR. GARREN: Richard Garren for State of
8 Oklahoma.

9 MR. BULLOCK: Louis Bullock for the State
10 of Oklahoma. 01:02PM

11 MR. RIGGS: David Riggs for the State of
12 Oklahoma.

13 MR. McDANIEL: Scott McDaniel for Peterson
14 Farms.

15 MR. THOMPSON: Paul Thompson, Junior, on 01:02PM
16 behalf of George's.

17 MS. MANN: Dara Mann on behalf of the
18 Cargill defendants.

19 MR. FITZPATRICK: Ed Fitzpatrick with
20 Tyson. 01:02PM

21 MR. BOND: Michael Bond for the Tyson
22 defendants.

23 MR. GEORGE: Robert George for the Tyson
24 defendants.

25 MR. SANDERS: Bob Sanders for Cal-Maine. 01:02PM

1 MR. BULLOCK: Do we have anybody on the
2 phone?

3 MS. GRIFFIN: Jennifer Griffin for Willow
4 Brook Foods.

5 VIDEOGRAPHER: Thank you. The witness may 01:02PM
6 be sworn in.

7 PATRICK PILKINGTON
8 having first been duly sworn to testify the truth,
9 the whole truth and nothing but the truth, testified
10 as follows:

11 DIRECT EXAMINATION

12 BY MR. GARREN:

13 Q Please state your full name for the court.

14 A I'm Patrick Martin Pilkington.

15 Q And are you currently employed, Mr. 01:02PM
16 Pilkington?

17 A Yes, I am.

18 Q And for whom are you employed?

19 A With Tyson Foods.

20 Q How long have you been with Tyson Foods as an 01:03PM
21 employee?

22 A Working on eleven years.

23 Q What position do you currently hold?

24 A I'm vice-president of live production
25 operations. 01:03PM

02:26PM

02:27 PM

02:27 PM

02:27 PM

02:28PM

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21 **A** No. What I'm wanting to clarify is that's not
22 -- their job is to advise growers and to make them
23 aware of best management practices and to help them
24 in ways that make sure their flock performs very
25 well. It's not simply an inspection role.